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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Dominique Ferrell,

Defendant.

Case:2:21-cr-20008
Judge: Hood, Denise Page
MJ: Patti, Anthony P.
Filed: 01-06-2021 At 05:14 PM
INDI USA V. FERRELL (DA)

Violations:
18 U.S.C. § 922(g)(1)
21 U.S.C. § 841(a) and (b)
Forfeiture Allegations

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Felon in possession of a firearm

18 U.S.C. § 922(g)(1)

On or about August 18, 2020, in the Eastern District of Michigan, Southern Division, the defendant, Dominique Ferrell, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a Ruger, model P89DAO, 9mm pistol, said firearm having been shipped and transported in interstate and/or foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT TWO

Possession with intent to distribute controlled substances (cocaine base)

21 U.S.C. § 841(a)(1) and (b)(1)(B)(iii)

On or about August 18, 2020, in the Eastern District of Michigan, Southern Division, the defendant, Dominique Ferrell, knowingly possessed with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Pursuant to 21 U.S.C. § 841(b)(1)(B)(iii), it is further alleged that this violation involved 28 grams or more of a mixture or substance containing cocaine base, a Schedule II controlled substance.

COUNT THREE

Possession with intent to distribute controlled substances (heroin and fentanyl)

21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi)

On or about August 18, 2020, in the Eastern District of Michigan, Southern Division, the defendant, Dominique Ferrell, knowingly possessed with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Pursuant to 21 U.S.C. § 841(b)(1)(B)(vi), it is further alleged that this violation involved 40 grams or more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimede, commonly known as fentanyl, a Schedule II controlled substance.

COUNT FOUR

Possession with intent to distribute controlled substances (fentanyl)

21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi)

On or about August 18, 2020, in the Eastern District of Michigan, Southern Division, the defendant, Dominique Ferrell, knowingly possessed with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Pursuant to 21 U.S.C. § 841(b)(1)(B)(vi), it is further alleged that this violation involved 40 grams or more of a mixture or substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, commonly known as fentanyl, a Schedule II controlled substance.

COUNT FIVE

Possession with intent to distribute controlled substances (pentylone; aka eutylone)

21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about August 18, 2020, in the Eastern District of Michigan, Southern Division, the defendant, Dominique Ferrell, did knowingly possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

Pursuant to 21 U.S.C. § 841(b)(1)(C), it is further alleged that this violation involved a mixture or substance containing pentylone, also known as eutylone, a Schedule I controlled substance.

FORFEITURE ALLEGATIONS

18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461(c)

Criminal Forfeiture

The allegations contained in counts one through five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d); Title 21 United States Code, Section 853(a); and Title 28 United States Code, Section 2461(c).

Upon conviction of the firearm offense charged in count one of the Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28 United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offense, or any firearm or ammunition intended to be used in any offense referred to in Title 18, United States Code, Section 924(d)(3), where such intent is demonstrated by clear and convincing evidence.

Upon conviction of the controlled substance offenses alleged in counts two through five of the Indictment, defendant shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the named violations. Such property

includes, but is not limited to, a money judgment in an amount to be determined, representing the total value of all property subject to forfeiture as described herein.

If any of the property described above, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States shall be entitled to forfeit other property of defendant up to the value of the above described forfeitable property, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

This is a True Bill

s/Grand Jury Foreperson

Grand Jury Foreperson

Matthew Schneider
United States Attorney

Craig Wininger
Chief, Violent and Organized Crime Unit

s/Hank Moon

Hank Moon
Assistant United States Attorney

Dated: January 6, 2021

United States District Court
Eastern District of Michigan

Criminal Case Cover

Case:2:21-cr-20008

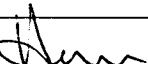
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information	Companion Case Numbers: 20-20405; 20-20406; 20-20407
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	Judge Assigned to All Three Companion Cases: David M. Lawson
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: 

Case Title: U.S. v. Dominique Ferrell**County where offense occurred:** Wayne**Offense Type:** Felony

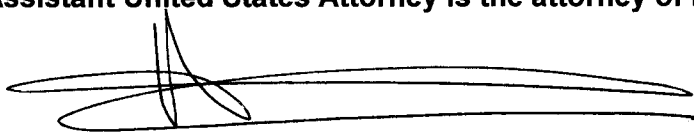
Indictment – no prior complaint

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____**Reason:****Defendant Name****Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

January 6, 2021

Date

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(313) 226-0220¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.